

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ISMAEL HALIDOU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO  
ZHU, YONGGANG SHAO, GANG WANG,  
LOUIS T. HSIEH, JACK LAI, NICOLA  
SARNO, YUEPENG WAN, and QIQANG  
YAO,

Defendants.

No. 1:07-cv-09745 (JGK)

**STIPULATION AND PROPOSED ORDER FOR TRANSFER AND CONSOLIDATION**

WHEREAS, Ismael Halidou instituted this securities class action lawsuit on behalf of certain stockholders of LDK Solar Co. Ltd. ("LDK") in this Court on November 2, 2007;

WHEREAS, the District Court for the Northern District of California has consolidated several similar securities class action lawsuits instituted in that District into *In re LDK Solar Securities Litigation*, C-07-05 182-WHA, and has appointed a lead plaintiff in those cases, pursuant to the Private Securities Litigation Reform Act;

WHEREAS, the parties agree that transfer and consolidation of these related actions would promote judicial economy, avoid duplicative proceedings, and streamline adjudication of these related matters;

IT IS HEREBY STIPULATED by the parties, through their counsel of record, that:

1 The above-captioned case shall be transferred to the District Court for the Northern District of California, pursuant to 28 U.S.C. § 1404(a);

2 Once the case is transferred, the undersigned agree that it should be consolidated into the consolidated litigation known as *In re LDK Solar Securities Litigation*, C-07-05 182-WHA.

3. Without waiving any challenges to jurisdiction or venue, LDK, through its counsel of record indicated below, agrees to waive process of service as to the service of this complaint on LDK.

Dated: January 23, 2008

Respectfully submitted,

COHEN, MILSTEIN, HAUSFELD & TOLL,  
P.L.L.C.

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**ORDER**

It is so Ordered.

Dated \_\_\_\_\_